## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

IN RE:	) CASE NO: 14-50039-399
SCOTT L OATMAN	) Chapter 13
	)
	) Trustee's Objection to Confirmation
	) Original Confirmation Hearing set for:
Debtor	March 11, 2015 10:00 am

## TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

**COMES NOW** John V. LaBarge, Jr., Standing Chapter 13 Trustee, and for his objection to confirmation states as follows:

- 1. The Mandatory Model Plan has not been used or has been modified. The current version of the Mandatory Model Plan is available on the Bankruptcy Court's website.
- 2. The plan does not provide sufficient funds to pay all creditors entitled to full payment, including fair market value of secured claims and priority debts. 11 U.S.C. §§ 1322(a)(2) & 1325(a)(5)(B)(ii)
- 3. The plan provides for interest to secured creditors at a rate other than that determined by the Clerk under Local Rule 3015-2(E).
- 4. The plan fails to pay the full attorney fee owed per the 2016(b) form.
- 5. The set monthly payments to be made by the Trustee exceed the plan payment.
- 6. SCHEDULE D OMITS CREDITOR IN 5C.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

| Dated: March 05, 2015 | /s/ John V. LaBarge, Jr. | John V. LaBarge, Jr. | Standing Chapter 13 Trustee | P.O. Box 430908 | St. Louis, MO 63143 | (314) 781-8100 Fax: (314) 781-8881 | trust33@ch13stl.com

The undersigned hereby certifies that he served the above notice on this day of March 05, 2015, either through the Court's ECF system or by ordinary mail, postage pre-paid, addressed to:

/s/ John V. LaBarge, Jr.

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